

**IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

In re:

JAMES EDWARD MYERS,
JACQUELINE JAMES MYERS

Debtors.

Case No. 15-30010-can-13
Chapter 13

**DEBTORS' MOTION AND SUGGESTIONS TO SUSPEND PLAN PAYMENTS
IN THE AMOUNT OF \$7,000.00**

COMES NOW debtors James and Jacqueline Myers by and through their counsel of record Jonathan D. Bhend, and hereby requests this Court allow them to suspend their current delinquency of \$7,000.00 for the following reasons:

1. Debtors filed for Chapter 13 Bankruptcy on January 12, 2015.
2. Debtors are delinquent \$7,000.00 in plan payments.
3. Debtor James Myers was unable to earn income as a school bus driver during the summer months. Additionally, his income from acting as a real estate agent has been lower over the past several months.
4. Debtor Jacqueline Myers business likewise has had a slow period wherein she has seen lower than average revenue. Debtor Jacquelyn Myers indicates her business typically increases around the beginning of the year.
5. Simultaneously to filing this motion, debtors will file an amended plan lowering their plan payments for the months of November and December 2015 and increasing their plan payment beginning in January 2016 so that their plan should amortize if said suspension is allowed.

6. Debtors request this Court allow them to their current delinquency of \$7,000.00 which will allow their Plan to proceed and cure the pending arrearage.

WHEREFORE debtors respectfully request this Court allow them to their current delinquency of \$7,000.00 which will allow them to cure the pending arrearage and continue with the Chapter 13 Plan.

BHEND LAW OFFICE

By: /s/ Jonathan D. Bhend
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ATTORNEY FOR DEBTORS

NOTICE OF MOTION

Any Response to this Motion must be filed within (21) days of the date of this notice with the Clerk of the United States Bankruptcy Court. Documents can be filed electronically at <http://ecf.mowb.uscourts.gov>. A copy of such Response shall be served electronically by the Court on the Chapter 13 Trustee and all other parties to the case who have registered for electronic filing. If debtor's counsel is not registered for electronic filing, you must serve the response by mail. If a Response is timely filed, a hearing will be held on date and time determined by the Court. Notice of such hearing will be provided to all parties in interest. If no Response is filed within twenty (20) days, the Court will enter an Order granting the Motion.

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was served through the Court's ECF filing system on same date as filed.

/s/ Jonathan D. Bhend
Jonathan D. Bhend, Attorney